

Illinois Commerce Commission
Pipeline Safety
Pipeline Safety Report

Operator: NORTH SHORE GAS CO	Operator ID#: 13660
Exit Meeting Contact: (Not Applicable)	Total Man Days: 0
Pipeline Safety Representative(s): Steve Canestrini	
Company Representative to Receive Report: Tom Webb	Emailed Date:
Company Representative's Email Address: TJWebb@peoplesgasdelivery.com	06/25/2014

Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Compliance Follow-Up	Office	Steve Canestrini	Waukegan	0	6/17/2014	

Statement of Activities

Staff reviewed the response letters received from North Shore Gas, dated May 21, 2014, and May 28, 2014. The letters pertained to NOA's 2014-A001-0003 thru 2014-A001-00022, and 2014-A001-00026 thru 2014-A001-00028. As a result of the information provide by North Shore Gas, Staff will consider the above NOA's closed.

INSPECTION FINDINGS

Compliance Follow-Up

Issues(s) Found:

[NO ISSUES FOUND]

Notice Of Amendment(s) Found:

[NO NOAS FOUND]

Notice Of Violation(s) Found:

[NO NOPVS FOUND]

PAST INSPECTION FINDINGS

Issue(s) Corrected:

[NO ISSUES CORRECTED]

Notice Of Amendment(s) Corrected:

2014-A001-00003 (Code Part [192.613(a)][192.613(b)]) - A procedure could not be located where the MAOP would be reduced if the pipeline facility was determined to be in unsatisfactory condition. Under the Safety Inspection Program, NSG O&M, exhibit 3. Under section 4, Continuing Surveillance, a section has been added that that the MAOP will be decreased if the facility cannot be reconditioned or repaired. Staff will consider this NOA closed.

2014-A001-00004 (Code Part [192.605(b)][192.741(a)]) - North Shore Gas did not have a section in their O&M manual which required telemetering if there were more than one regulating station supplying one district. Under Exhibit 1, General, section 2;

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Distribution Mains, Service Pipes and Regulators, a section was added that requires at least one pressure recording device is a distribution system is fed by more than one regulating station. Staff will consider the NOA closed.

2014-A001-00005 (Code Part [IL ADM. CO.265.100(b)]) - North Shore Gas previously stated in their O&M manual, that notification was to be made to the ICC for third party damage on the company's transmission lines. North Shore Gas updated Exhibit 5, Emergency Operation Plan, under section 3, JULIE Enforcement, JULIE will be notified when either a North Shore Gas or third party damage any NSG line. Staff will consider the NOA closed.

2014-A001-00006 (Code Part [192.605(b)][192.453]) - North Shore Gas O&M did not state that only qualified personnel could implement any corrosion control procedures. Under Section 7, Corrosion Control Policy, section 2, a statement has been added that only qualified personnel by experience or training would implement a corrosion control procedure. Staff will consider the NOA closed.

2014-A001-00007 (Code Part [192.605(b)][192.455(e)]) - North Shore Gas procedures did not address the use of aluminum where it could be exposed to an environment with a natural Ph in excess of 8. Under Exhibit 7, Corrosion Control Policy, section V, a statement has been added that aluminum is not in North Shore Gas system. Staff will consider the NOA closed.

2014-A001-00008 (Code Part [192.605(b)][192.475(b)(3)]) - North Shore Gas O&M plan did not address the steps that will be taken when internal corrosion is identified. Under Exhibit 7, Corrosion Policy, section VI, now spell out the procedures that will be followed if internal corrosion is discovered. Staff will consider the NOA closed.

2014-A001-00009 (Code Part [192.605(a)][192.619(a)(1)]) - Documentation could not be provided as to how North Shore Gas determined their MAOP. Under Integrys O&M Section 1100.3, now defines how MAOP is determined. Staff will consider the NOA closed.

2014-A001-00010 (Code Part [192.605(a)][192.703(b)]) - A procedure could not be located which requires any segment of pipeline that becomes unsafe, must be repaired, replaced or removed from service. Under Exhibit 3, Safety Inspection Program, section IV, a section was added that describes the procedures that will be followed if a facility becomes unsafe. Staff will consider the NOA closed.

2014-A001-00011 (Code Part [192.605(b)][192.741(b)]) - Documentation could not be provided to determine the necessity of installing telemetering or recording gauges in a distribution system supplied by one regulating station. Under Exhibit 1, General, section 2, Distribution Mains, Service Pipe, and Regulators, a section was added which describes the consideration given for a distribution system supplied by one regulating station. Staff will consider the NOA closed.

2014-A001-00012 (Code Part [192.605(b)][192.487(a)]) - Documentation could not be provided on the procedures used if localized corrosion has reduced wall thickness. Under Exhibit 7, Corrosion Control Policy, section VI, a section has been added which addresses the procedures once internal corrosion has reduced wall thickness. Staff will consider the NOA closed.

2014-A001-00013 (Code Part [192.605(a)][192.619(a)(3)]) - Documentation could not be provided which allowed for the determination of MAOP based on the 5 year operating history between July 1, 1965, and July 1, 1970. Under Integrys O&M, section 1100.3, Methods to Determine MAOP, a statement was added which allows for the determination of MAOP based on the operating pressure between tis period. Staff will consider the NOA closed.

2014-A001-00014 (Code Part [192.605(b)][192.487(b)]) - Documentation could not be provided on the procedures used if generalized corrosion has reduced wall thickness. Under Exhibit 7, Corrosion Control Policy, section VI, a section has been added which addresses the procedures once internal corrosion has reduced wall thickness. Staff will consider the NOA closed.

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2014-A001-00015 (Code Part [192.605(a)][192.619(b)]) - Documentation could not be provided that required overpressure protection if installed if 192.619(a) is applicable. Under Integrys Standard 1100.3, a statement was added which requires overpressure protection devices if this code section is applicable. Staff will consider the NOA closed.

2014-A001-00016 (Code Part [192.605(b)][192.455(a)]) - Documentation could not be provided which required pipelines installed after July 31, 1971, must be externally coated and cathodically protected. Under Exhibit 7, Corrosion Control Policy, Section 3, now describes pipelines installed by North Shore Gas will be externally coated and cathodically protected. Staff will consider the NOA closed.

2014-A001-00017 (Code Part [192.605(a)][192.609]) - Staff could not locate a procedure which required the operator to perform a class location survey if an increase in population density indicates a change in class location. Under Exhibit 1, Safety Inspection Program, section G, a section was added which requires a class location study if there is an indication of an increase in population density. Staff will consider the NOA closed.

2014-A001-00018 (Code Part [192.605(b)][192.741(c)]) - Documentation could not be located to require the operator to take corrective measures if there are indications of abnormally high or low pressures. Under Exhibit 1, General, section 2, Distribution Mains, Service Pipes and Regulators, a section has been added that describes the procedure if the above conditions are identified. Staff will consider the NOA closed.

2014-A001-00019 (Code Part [192.13(c)]) - Documentation could not be provided which would allow for the use of pre-test pipe. Under General Order 2.170, section IV, item 4 now allows for the use of pre-tested pipe and how the test will be documented. Staff will consider the NOA closed.

2014-A001-00020 (Code Part [192.605(a)][192.605(b)(5)]) - A procedure could not be located that contains provisions for a start-up or shut-down of a system. North Shore Gas has added Exhibit 13, Start-up and Shut-down of a Pipeline to their procedures. Staff will consider the NOA closed.

2014-A001-00021 (Code Part [192.605(b)][192.457(a)]) - Documentation could not be provided which requires coated steel transmission pipe installed prior to August 1, 1971. Under Exhibit 7, Corrosion Control Policy, section V, a section has been added which addresses the company meeting the requirements of the CFR code. Staff will consider the NOA closed.

2014-A001-00022 (Code Part [192.605(a)][192.619(a)(2)]) - Documentation could not be provided for a procedure to determine the MAOP to be determined by the test pressure divided by the applicable factor. Under Integrys 1100.2, Factors for Calculating MAOP has been added. Staff will consider the NOA closed.

2014-A001-00026 (Code Part [192.605(a)][192.613(a)]) - Staff could not locate a procedure to review continuing surveillance records for potential changes in MAOP, Failures, Changes in Leak History, or Corrosion. Under Exhibit 3, Safety Inspection Manual, section IV, was added to address a procedure to review this information as part of continuing surveillance. Staff will consider the NOA closed.

2014-A001-00027 (Code Part [192.605(b)(3)]) - North Shore Gas self-reported three instances where a required survey was not completed within the compliance date due to a delay in the As-built process. In addition to discussion with North Shore Gas, a section was added under Exhibit 3, Safety Inspection Program which requires all new facilities to be surveyed within their required timeframe based on the date gas was introduced into the system. This section also discusses adequate records must be available for locating purposes once gas is introduced into the piping. Staff will consider the NOA closed.

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2014-A001-00028 (Code Part [192.605(b)(1)]) - Staff was unable to locate a procedure for cut-out of main on medium pressure. Under North Shore Gas Main Work Order 1.072, it now clarifies the procedure to cut-outs of main on medium pressure. Staff will consider the NOA closed.

Notice of Violations(s) Corrected:

[NO NOPVS CORRECTED]